

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ROSS JAY LAWSON,

Plaintiff,

v.


Case No.: 00-6009-CIV-DIMITROULEAS
Magistrate Judge SORRENTINOKEN JENNE, WILLIAM HITCHCOCK,
BROWARD COUNTY DEPARTMENT OF
CORRECTIONS AND REHAB., ET AL,

" PRETRIAL STATEMENT "

Comes Now the Plaintiff ROSS JAY LAWSON, (pro,se) and files this/his "PRETRIAL STATEMENT" as required by Judge SORRENTINO'S "ORDER SCHEDULING PRETRIAL PROCEEDINGS WHEN PLAINTIFF IS PROCEEDING PRO,SE" dated May 1, 2000, deadline being 8/25/2000 of paragraph (4) of such Order.

(a) Violations of Plaintiff's First, Fifth, and Fourteenth Amendments/Rights.

This case is about the total ban, and later the non-religious total ban, on publications coming into Broward County Main Jail for non-convicted and convicted inmates/pretrial detainees. And how that ban(s) violated the Plaintiff's Constitutional or Civil Rights. And how Plaintiff suffered from such Rights being violated. And how all Defendants named in this action are responsible/liable for their knowingly violating/violating the Plaintiff's rights. And how because of Plaintiff's requests for his Constitutional Rights to be honored, the Plaintiff was/is has been subjected to acts of reprisal by actions/or lack of actions by the Defendants named in this suit. And how the Plaintiff has suffered because of this reprisal/Constitutional Rights being violated, and how the Defendants in this action are liable/responsible for such acts of reprisal. Some acts of reprisal being; Denied access to the Law Library in the B.C.M.J., Moved to a high custody cell, Legal papers and other documents being confiscated, Denied contact visits when others were granted for certain inmate(s), Extended visits or special visitations being denied when other inmate(s) got such granted, Harassment, etc. etc. And how all Defendants named in this suit/action are liable/responsible for the above, in both their individual and official capacities.



(b) All listed in (a) will be proven through Grievances, Requests, S.O.P.'s, other such documents, and testimony/witnesses. All relating to the issues stated in the Plaintiff's claims. Or in other words I will prove issues in the AMENDED COMPLAINT and the issues described in paragraph (a) by everything listed in this paragraph (b).

(c)

EXHIBITS

The Broward County Jail's S.O.P. Manual. from 1990 untill present date.

All documents as asked for in Plaintiff ROSS JAY LAWSON's Firsts Request For Production Of Documents Etc. Under Rule 34.

(Plaintiff Ross Jay Lawson's)

Ex.#	(Exhibits)		
↓	(REJECTED Articles)		
1p	Rejected Mail Notification	UA Book (Non-Religious)	10/97
2p	" " "	UA EMail	10/29
3p	" " "	UA Catalog	9/10/99

	(REQUESTS) on publications)=(RE)(Grievances)=(GR)	
4p (RE) Library Coordinator		10/25/97
5p (RE) Other		10/28/97
6p (RE) Informal Grievance Super Int.		11/5/97
7p (GR)		11/10/97
8p (GR)		11/20/97
9p (RE) Chaplin		11/17/98
10p (RE) Super Int Hitchcock ^{Mail Room}		11/17/98
11p (RE) Super Int. Hitchcock		11/17/98
12p (RE) Mail Room		11/20/98

13p	(RE) Chaplin	11/20/98
17p	(RE) Super Int. Hitchcock	11/25/98
15p	InterOffice Memorandum Attached SOP	11/23/98
16p	Copy of (2) letters sent to Hitchcock & Sheriff	12/4/98
17p	(GR)	9/3/99
18p	(RE) Mailroom	9/9/99
19p	(GR) + (Attached Inmate Handbook)	10/8/99
20p	(RE) Library Coordinator	10/13/99
21p	(GR)	10/29/99
22p	(RE) Mail Room	11/25/99
23p	(GR)	6/5/99.
24p	Stipulation of Dismissal	
	(next Page)	

Case no: 98-7095-Civ-RYSKAMP

Ex.# (Exhibits) from Inmate William Coday
 (Grievance)=GR (Requests)=RE

1c	(GR)	11/28/97
2c	(GR)	1/14/98
3c	(GR)	4/6/98
4c	(GR)	4/11/98
5c	(GR)	4/11/98
6c	(GR)	7/13/98
7c	(GR)	7/20/98

8c (GR)

9c (GR)

10c (GR)

11c (GR)

12c (GR)

13c (GR)

14c (GR)

15c (GR)

16c (GR)

17c (GR)

17c (GR)

17c (GR)

17c (GR)

20c (GR)

21c (GR)

22c

23c

24c

25c

26c (GR)

27c (GR)

28c (GR)

29c (GR)

30c (GR)

31c (GR)

32c (GR)

33c (GR)

34c (GR)

35c (GR)

Three parts (Stapled)

6 parts (Stapled) w/memo

with SOP attached (Stapled)

Letter dated 10/14/98
Memo October 19, 1998Inter Office Memorandum 3 parts (Stapled)
Letter

8/4/98

8/8/98

8/8/98

8/25/98

9/2/98

9/8/98

9/8/98

9/13/98

9/13/98

9/13/98

9/27/98

10/4/98

10/5/98

10/5/98

10/14/98

10/19/98

10/26/98

10/30/98

11/9/98

11/9/98

11/16/98

11/16/98

12/1/98

12/1/98

12/13/98

12/20/98

12/20/98

12/25/98

37c (GR) 2 attached (Stapled)

12/25/98

37c (GR)

12/31/98

38c Memorandum +1 attached

April/7/99

39c (GR)

4/22/2000

40cc SOP w/ 8 attached (Stapled) 5.4.1

(Exhibits)
(Law Library etc.)

Ex #

1LL Signed proof of giving

11/11/99

2LL (RE) +1 attached (stapled)

11/8/99

3LL (RE)

11/10/99

4LL (RE)

11/11/99

5LL (GR) +2 attached (Stapled)

11/12/99

6LL Letter to Hitchcock

11/13/98

7LL (RE)

11/14/99

8LL (RE)

11/18/99

9LL (RE)

11/18/99

10LL (RE)

11/19/99

11LL (GR)

11/24/99

12LL (RE)

11/27/99

13LL Letter to Hitchcock

11/28/99

14LL (RE)

12/3/99

15LL (GR)

12/15/99

16LL (GR)

12/15/99

17LL (RE)

12/17/99

18LL (GR) +10 attached (Stapled)

5/17/99

19 LL Inmate Correspondence +2 attached (July/2/99

20 LL Count Order

case no: 97-13907

21 LL Count Order +5 attached

1 1 97-13907CF10

22 LL LL schedule

I/m Copy 6/8/98

23 LL Letter to Elijah Williams ^{confidential} +8 attached (Stoped)

Dec/13/99

24 LL Inmate Correspondence +2 attached

Dec/3/99

25 LL Count Order

Dec/3/99

26 LL 2 Count Orders LL

27 LL (RE) Tiff.

8/11/99

28 LL Motion Access LL

29 LL Motion for extended Contact visit

(d)

I. Answer to Interrogatory No. 1:

- a. Susan McCampbell, Director
Date of Hire: 08-04-94
Resigned: 01-16-99
- b. F. Patrick Tighe, Lieutenant Colonel
Date of Hire: 05-24-82
- c. Sharron Freeman, Unit Manager
Date of Hire: 07-27-87
- d. Bennie Johnson, Volunteer Coordinator
Date of Hire: 02-05-96
- e. Betty Williams, Sergeant
Date of Hire: 11-13-89
- f. Linda Kristofik, Business Manager
Date of Hire: 06-01-92
- g. Marques Gibson, Lieutenant
Date of Hire: 02-17-87
- h. George Rimel, Deputy
Date of Hire: 07-31-89
- i. Juliann Mellott, Deputy

2. **Answer to Interrogatory No. 2:**

- a. Susan McCampbell, Director, reviewed and approved Standard Operating Procedures (SOPs).
- b. F. Patrick Tighe, Lieutenant Colonel, reviewed and approved SOPs.
- c. Sharron Freeman, Unit Manager, Supervisor to the Volunteer Coordinator.
- d. Bennie Johnson, Volunteer Coordinator, receives books for the leisure library.
- e. Betty Williams, Administrative Sergeant to the Lieutenant Colonel, knowledge of all complaints received by the Lieutenant Colonel.
- f. Linda Kristofik, Business Manager, coordinates the purpose of magazines and newspapers through the inmate welfare account.
- g. Marques Gibson, Lieutenant Accreditation, assisted in the review/revision of SOPs.
- h. George Rimel, Deputy, prepares SOPs for review.
- i. Juliann Mellott, Deputy, assists Risk Management in the research of claims.

5. **Answer to Interrogatory No. 5:**

Mailroom staff is classified as Account Specialist I.

a. **January 1996**

- i. Joan Castronovo
Date of Hire: 06-25-90
Resigned: 06-27-96
- ii. Jack Kane
Date of Hire: 07-09-90
- iii. Nancy Russell
Date of Hire: 07-09-90

b. **January 1997**

- i. Arlene Coopersmith
Date of Hire: 04-30-90
Resigned: 02-14-98
- ii. Jack Kane
Date of Hire: 07-09-90
- iii. Nancy Russell
Date of Hire: 07-09-90

c. **October 1997**

- i. Arlene Coopersmith
Date of Hire: 04-30-90
Resigned: 02-14-98

- ii. Jack Kane
Date of Hire: 07-09-90
- iii. Nancy Russell (also known as Bartberger)
Date of Hire: 07-09-90

d. March 1998

- i. Brian Perrotta
Date of Hire: 08-18-97
- ii. Jack Kane
Date of Hire: 07-09-90
- iii. Nancy Russell (also known as Bartberger)
Date of Hire: 07-09-90

e. August 1997

- i. Nuvia Pikerie
Date of Hire: 08-24-98
- ii. Jack Kane
Date of Hire: 07-09-90
- iii. Nancy Russell (also known as Bartberger)
Date of Hire: 07-09-90

f. October 1997

- i. Sylvia Lopez
Date of Hire: 10-19-98
- ii. Jack Kane
Date of Hire: 07-09-90

- iii. Elsie Francois
Date of Hire: 10-05-98

g. Supervisors

- i. Linda Kristofik, Business Manager
Date of Hire: 06-01-92
- ii. Kurt Harden, Inmate Asset Coordinator
Date of Hire: 09-04-90

6. Answer to Interrogatory No. 6:

- i. Rick Braswell, Chaplain
Date of Hire: 02-13-89
- ii. Bennie Johnson, Volunteer Coordinator
Receives books for the leisure library.
- iii. Linda Kristofik, Business Manager
Date of Hire: 06-01-92
- iv. Kurt Harden, Inmate Asset Coordinator
Date of Hire: 09-04-90

7. Answer to Interrogatory No. 7:

- i. Rick Braswell, Chaplain
Date of Hire: 02-13-89
- ii. Bennie Johnson, Volunteer Coordinator
Receives books for the leisure library.
- iii. Linda Kristofik, Business Manager
Date of Hire: 06-01-92

- iv. Kurt Harden, Inmate Asset Coordinator
Date of Hire: 09-04-90
- v. Joan Castronovo, Account Specialist I
Date of Hire: 06-25-90
Resigned: 06-27-96
- vi. Jack Kane, Account Specialist I
Date of Hire: 07-09-90
- vii. Nancy Russell, Account Specialist I
Date of Hire: 07-09-90
- viii. Arlene Coopersmith, Account Specialist I
Date of Hire: 04-30-90
Resigned: 02-14-98
- ix. Brian Perrotta, Account Specialist I
Date of Hire: 08-18-97
- x. Nuvia Pikerie, Account Specialist I
Date of Hire: 08-24-98
- xi. Sylvia Lopez, Account Specialist I
Date of Hire: 10-19-98
- xii. Elsie Francois, Account Specialist I
Date of Hire: 10-05-98

8. Answer to Interrogatory No. 8.

- i. Linda Kristofik, Business Manager
Date of Hire: 06-01-92

- ii. Kurt Harden, Inmate Asset Coordinator
Date of Hire: 09-04-90
- iii. Maria Davison, Assistant Business Manager
Date of Hire: 08-28-95

9. Answer to Interrogatory No. 9.

- i. Linda Kristofik, Business Manager
Date of Hire: 06-01-92
- ii. Kurt Harden, Inmate Asset Coordinator
Date of Hire: 09-04-90
- iii. Maria Davison, Assistant Business Manager
Date of Hire: 08-28-95

Mitch Polay

1424 S. Andrews Ave #100

Ft Lauderdale, Fla. 33316

Deborah Carpenter Wheeler

600 South Andrews Ave

Suite 600

Ft Lauderdale, FL 33301

Others found will be brought to
this court's attention as discovered.

Federal Court Liaison Mr Tiedeberg (address unknown)

Sheriff Ken Jenne BCMJ 11

Captain William Hitchcock BCMJ 11

Lt Powers

Sgt. Calum 8th Floor Sgt. BCMJ

If others are found
then they will be
added to this list.

(e)

Inmate Witnesses

① William Coday 5097-24403

PO Box 9356

Ft Lauderdale, FL 33310

BCM/J

② Brett Fenster 1300-00255

PO Box 9356

Ft Lauderdale, FL 33310

BCM/J

③ Terrell L. Sessions

PO Box 9356

Ft Lauderdale, FL 33310

BCM/J

④ Gerry Parish

PO Box 9356

Ft Lauderdale, FL 33310

BCM/J

⑤ Ross Lawson FL97-4905

PO Box 9356

Ft Lauderdale, FL 33310

BCM/J

(f) (Summary of the testimony each witness will give if called as witness's.)

* Best of their knowledge!

- 1 All matters relating to the ban on publications.
- 2 Rules that govern such.
- 3 Law Library Cont. /OR Library book cont.
- 4 Acts of reprisal against Plaintiff.
- 5 Acts of reprisal.
- 6 Volunteer Library Coordinator.
- 7 Visitation.
- 8 Law Library
- 9 Publications /Religion non Religion.
- 10 All matters /issues specified in suit against Def. and their knowledge of such.
- 11 High custody cells 8th Floor AC confinement.

The Plaintiff does not know the extent of each witnesses knowledge of the above. But relies on the truth to be brought to light. Witness's working the Jail for their knowledge of the field they work in and that truth to be brought to light.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Plaintiff's "Preliminary Statement" was mailed this 29th day of August 2000 to Ken Jenner & William Hitchcock care of Adorno & Zeder, P.A.

Robert Schwartz

Attorneys for Defendant's

888 S.E. 3rd Ave

Suite 500

Ft Lauderdale, FL 33335-9002

By Ross Jay Lawson FL-979905
PO Box 9356
Ft Lauderdale, FL 33316